

NVB 2016 (05/2022)

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEVADA**

Fee Application Cover Sheet

Case No.: 24-12829-nmc Chapter: 11 Hearing Date/Time: _____Debtor: DTH 215 Venture, LLCApplicant: Ackman-Ziff Real Estate Group, LLCDate of Employment: September 30, 2024Interim Fee Application No: 1 OR Final Fee Application _____**Amounts Requested:****Client Approval:** Yes No Fees: \$ 388,687.50Expenses: \$ 0.00Total: \$ 388,687.50Hours: 518.25 Blended Rate: \$ 750.00Fees Previously Requested: \$ 0.00 Awarded: \$ 0.00Expenses Previously Requested: \$ 0.00 Awarded: \$ 0.00Total Previously Requested: \$ 0.00 Awarded: \$ 0.00Total Amount Paid: \$ 0.00**Chapter 13 Cases ONLY:**Yes No Elected to accept the Chapter 13 Presumptive Fee pursuant to LR 2016.2, and filed the "Notice of Election to Accept the Presumptive Fee" on _____.Yes No Participated in the Mortgage Mediation Program: If yes, amount received: \$ _____

I certify under penalty of perjury that the above is true.

Norma Guariglia

Digitally signed by Norma
Guariglia
Date: 2025.03.07 17:49:16 -08'00'

Signature

Date 03/07/2025

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 8 UNITED STATES BANKRUPTCY COURT
 9 FOR THE DISTRICT OF NEVADA

10 * * * * *

11 IN RE:

12 Case No. BK-24-12829-nmc
 13 (Chapter 11)

14 DTH 215 VENTURE, LLC,

15 Debtor.

**16 APPLICATION FOR APPROVAL OF
 17 FIRST INTERIM FEES AND EXPENSES
 18 OF DEBTOR'S FINANCIAL ADVISOR
 19 (ACKMAN-ZIFF REAL ESTATE
 20 GROUP, LLC)**

Hearing Date:

Hearing Time:

Est. Time: 10 minutes

Set By: OST Requested

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APPLICANT: ACKMAN-ZIFF REAL ESTATE GROUP, LLC, AS DEBTOR'S FINANCIAL ADVISOR		
FIRST INTERIM FEE APPLICATION	\$388,687.50	FEES
	\$0.00	COSTS
TOTAL FIRST INTERIM FEE APPLICATION	\$388,687.50	
CHAPTER 11 VOLUNTARY PETITION FILED ON JUNE 5, 2024. ORDER APPOINTING DEBTOR'S FINANCIAL ADVISOR ENTERED SEPTEMBER 30, 2024.		
PROSPECT FOR PAYMENT OF FEE/COST AWARD: Debtor expects to pay Applicant \$275,000 from its DIP Facility proceeds and the remaining balance from unencumbered assets after payment of ACRES Loan Origination, LLC's ("ACRES") loans.		

1 The Application of ACKMAN-ZIFF REAL ESTATE GROUP, LLC ("Applicant"), duly
 2 appointed financial advisor for DTH 215 VENTURE, LLC ("Debtor"), Debtor and Debtor-in-
 3 Possession, represents the following:

4 1. On June 5, 2024 ("Petition Date"), the Debtor filed a Chapter 11 *Voluntary*
 5 *Petition for Non-Individuals Filing for Bankruptcy*, initiating Case No. 24-12829-nmc.

6 2. No trustee has been appointed and Debtor acts as Debtor-in-Possession.

7 3. The Debtor is the owner of certain mixed-use real property located at 215 S. Water
 8 Street, Henderson, Clark County, Nevada 89015 ("Property"), commonly known as The
 9 Watermark. *See Schedule A/B [ECF No. 10]*. The Property consists of a seven-story, 151-unit
 10 apartment building with around 33,604 square feet of ground floor retail space.

11 4. On August 27, 2024, the Debtor filed its *Application for Order Authorizing Debtor*
 12 *to Employ Financial Advisor [MB Bear Capital, LLC and Ackman-Ziff Real Estate Group]* [ECF
 13 No. 83] ("Employment Application"). On September 30, 2024, the Court entered its *Order*
 14 *Granting Application for Order Authorizing Debtor to Employ Financial Advisors [MB Bear*
 15 *Capital, LLC and Ackman-Ziff Real Estate Group, LLC]* [ECF No. 120].

16 5. On February 6, 2025, the Debtor filed its *Third Amended Plan of Reorganization*
 17 [ECF No. 221] ("Plan") and its *Third Amended Disclosure Statement* [ECF No. 222]
 18 ("Disclosure Statement"). The Court approved the Disclosure Statement pursuant to its order
 19 entered on February 18, 2025 [ECF No. 230]. The Plan confirmation hearing is currently
 20 scheduled for April 1, 2025, at 10:00 a.m.

21 6. Under the approved Employment Application, Applicant is to be compensated on
 22 a percentage basis of the total credit facility if the Debtor obtained financing from a lender other
 23 than ACRES. If the Debtor ultimately obtained financing from ACRES or restructured its
 24 prepetition loan with ACRES, then Applicant is to be compensated on an hourly basis at \$750.00
 25 per hour for its consulting fees.

26 7. Applicant has acted as the Debtor's financial advisor in this case to assist Debtor
 27 with financial matters affecting the estate, including seeking financing to complete construction
 28 of the Property, to fund a plan, and to fund general administrative and operational expenses.

1 8. This Application is made pursuant to 11 U.S.C. §§ 327, 330, and 331, which
 2 provide for reasonable compensation for services rendered by the Debtor's professionals. The
 3 Court can determine reasonable compensation for a professional by considering "the nature, the
 4 extent, and the value of such services, taking into account all relevant factors." 11 U.S.C. §
 5 330(a)(3). The method primarily used to determine compensation for attorneys and estate
 6 professionals retained on an hourly basis is to "multiply the number of hours expended by an
 7 hourly rate." *In re Yermakov*, 718 F.2d 1465, 1471 (9th Cir. 1983) (citation omitted). The Court
 8 may adjust the fee up or down as needed. *Blum v. Stenson*, 465 U.S. 886, 888 (1984). To determine
 9 a reasonable fee, the Court must examine the manner in which services are performed and the
 10 results achieved, considering facts that existed at the time the services were rendered. *Roberts,*
 11 *Sheridan & Kotel, P.C. v. Bergen Brunswig Drug Co. (In re Mednet)*, 251 B.R. 103, 108 (B.A.P.
 12 9th Cir. 2000).

13 9. As seen in more detail below, Applicant's professional services were reasonable
 14 and necessary and provided significant value to the estate by assisting the Debtor with obtaining
 15 needed financing for its reorganization efforts. Applicant's services were performed for the
 16 benefit of the Debtor's estate and not on behalf of any individual creditor or other person.

17 10. No payments have been made by the Debtor to Applicant for the services covered
 18 in this Application. Other than as set forth in the Employment Application, Applicant has entered
 19 into no agreement(s) with any other person for the sharing of compensation received or to be
 20 received for professional services rendered in connection with this case.

21 11. The reasonable value of the professional services rendered from August 16, 2024,
 22 through February 14, 2025, is based on total financial advisor fees of \$388,687.50 comprised of
 23 518.25 hours billed at the rate of \$750.00 per hour for Firas Turkmani, in addition to out-of-pocket
 24 costs of \$0.00, for a net fee application to Debtor's financial advisor in the amount of \$388,687.50.
 25 In addition to Applicant's request to receive payment of the net balance owing from the Debtor's
 26 estate, Applicant also seeks that these fees be approved by the Court as an allowed administrative
 27 expense in the Debtor's chapter 11 case. An itemization of Applicant's services and costs is
 28 attached as **Exhibit A**.

1 12. With respect to the allocation of time expended by Debtor's financial advisor on
 2 behalf of the Debtor's estate, the following is relevant:

<u>Task</u>	<u>Work</u>	<u>% of Total</u>	<u>Benefit to Estate</u>
1	Asset analysis and recovery - 0 hrs	0%	N/A
2	Asset disposition – 0.00 hrs	0%	N/A
3	Business operations – 0.00 hrs	0%	N/A
4	Case administration – 0.00 hrs	0%	N/A
5	Claims administration and objections – 0.00 hrs	0%	N/A
6	Employee benefits/pensions – 0.0 hrs	0%	N/A
7	Fee/employment applications – 0.00 hrs	0%	N/A
8	Fee/employment objections - 0.00 hrs	0%	N/A
9	Financing – 518.25 hrs	100%	Time spent understanding Debtor's financial needs, Debtor's existing assets and liabilities and financing possibilities during chapter 11 and seeking financing; assisting Debtor with negotiations with potential and existing lender and creditors; assisting Debtor with obtaining DIP Loan commitment from CL Credit, then later finalizing details for DIP loan with ACRES; and assisting Debtor with satisfying lender's requirements to close the DIP Loan.
10	Litigation – 0.00 hrs	0%	N/A
11	Meetings of Creditors – 0.00 hrs	0%	N/A
12	Plan and Disclosure Statement – 0.0 hrs	0%	N/A
13	Relief from Stay Proceedings – 0.0 hrs	0%	N/A

1 13. Applicant's efforts resulted in a successful closing on February 14, 2025, of the
2 DIP Facility from ACRES in the maximum principal amount of \$27,880,000. With the DIP
3 Facility, the Debtor was able to pay its settlement payment¹ to Gillett Construction, LLC
4 ("Gillett") for past work, recommence construction of its Property, and proceed with its
5 reorganization efforts. As a single asset real estate entity, the Debtor has no current revenue or
6 other sufficient liquid assets with which to fund its business operations and reorganization.
7 Without adequate financing, the Debtor could not complete construction of the Property and
8 would have had to try to liquidate the Property in its as-is condition or allow secured creditors to
9 foreclose, thus resulting in less value to potentially pay general unsecured creditors.

10 14. If this Application is approved by the Court, the Debtor expects to pay Applicant
11 the sum of \$275,000 from DIP Facility proceeds under its approved DIP Budget with ACRES.
12 Applicant has agreed to defer payment of the remaining balance of its approved compensation
13 until after the Debtor confirms its Plan and pays ACRES under the Plan.

14 WHEREFORE, Debtor requests approval of first interim compensation for ACKMAN-
15 ZIFF REAL ESTATE GROUP, LLC as Debtor's financial advisor for the period of August 16,
16 2024, through February 14, 2025, based on total fees of \$388,687.50 comprised of 518.25 hours
17 billed at the rate of \$750.00 per hour for Firas Turkmani; in addition to out-of-pocket costs of
18 \$0.00; for a net first interim fee application of \$388,687.50. Debtor also requests that Applicant's
19 approved fees and costs be considered an allowed interim fee and cost award and administrative
20 expense of this chapter 11 estate pursuant to 11 U.S.C. §§ 331 and 503(b), and that the Debtor be
21 authorized to pay Applicant \$275,000 from the ACRES DIP Facility on account of this first
22 interim fee Application; and for such other proper relief.

Respectfully submitted March 7, 2025.

HARRIS LAW PRACTICE LLC
/s/ Norma Guariglia
NORMA GUARIGLIA, ESQ.
Attorneys for Debtor

²⁷ ²⁸ ¹ The settlement payment to Gillett resulted in satisfaction of all recorded mechanic's liens against the Property, thus clearing around 32 liens from the Property's title and resolving several mechanic's lien lawsuits that were pending in state court.

1 **CERTIFICATE OF SERVICE**

2 On March 7, 2025, the foregoing document was served via ECF automated system to all
3 parties registered with ECF in this case on the date and time I filed the document with the Court's
4 ECF system.

5 I declare under penalty of perjury that the foregoing is true and correct.

6 Dated March 7, 2025.

7 */s/ Norma Guariglia*

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9 Norma Guariglia

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EXHIBIT A

Timekeeper: Firas Turkmani

\$388,687.50 accrued to date

518.25 hours accrued to date

(\$275,000) expected payment from DIP Loan**\$113,687.50 net remaining balance**

Date	Hours	Rate/Hr	Total Fee	Notes
8/16/2024	2.50	\$750	\$1,875	Analysis / Engagement Agreement, internal underwriting & memo preparation
8/17/2024	3.75	\$750	\$2,813	Phone calls, overall modeling of different loan structures
8/19/2024	5.25	\$750	\$3,938	Analysis for mediation, phone calls with debtor counsel and internal discussions
8/20/2024	3.00	\$750	\$2,250	Analysis for mediation, phone calls, internal excel modeling and analysis
8/21/2024	4.00	\$750	\$3,000	Cost Report, phone calls, internal analysis / modeling
8/23/2024	5.50	\$750	\$4,125	Bridge-to-HUD, phone calls, analysis, mediation analysis
8/24/2024	7.00	\$750	\$5,250	DIP underwriting analysis, Settlement Plan, negotiations with CLCredit
8/25/2024	3.00	\$750	\$2,250	Employment application, analysis on funding schedule
8/26/2024	6.50	\$750	\$4,875	Proof of Claims analysis, modeling to construct funding schedule, phone calls
8/27/2024	5.00	\$750	\$3,750	Proof of Claims, analysis, phone calls, termsheet negotiations for DIP
8/29/2024	5.50	\$750	\$4,125	Proof of Claims, analysis, phone calls, termsheet negotiations for DIP
8/30/2024	6.75	\$750	\$5,063	Proof of Claims, claim modeling & analysis, phone calls
8/31/2024	5.25	\$750	\$3,938	Lien Claimants, internal modeling & analysis, phone calls
9/3/2024	6.50	\$750	\$4,875	Disclosure statement, Lien Claimants, phone calls
9/4/2024	6.50	\$750	\$4,875	Lien Claimants, Settlement Plan, phone calls
9/5/2024	3.00	\$750	\$2,250	Negotiating with Darren, calls
9/6/2024	6.50	\$750	\$4,875	Underwriting Liens, calls with PCR, reconciliation of interest calculations
9/8/2024	6.25	\$750	\$4,688	Underwriting Liens, reconciling ACRES Balance
9/9/2024	3.75	\$750	\$2,813	Changing of Insurance brokers, interviewing PCR groups for carriers
9/10/2024	5.50	\$750	\$4,125	Reconciling costs spent, relief of stay analysis, ACRES negotiations
9/11/2024	5.75	\$750	\$4,313	Negotiating with Insurance brokers, analysis of hard/soft cost reconciliation
9/12/2024	6.75	\$750	\$5,063	ACRES Settlement Plan preparation, insurance negotiation, analysis of adequate protection for ACRES
9/13/2024	4.50	\$750	\$3,375	CLCredit TS negotiation, insurance negotiation, analysis for DIP Lender
9/15/2024	5.25	\$750	\$3,938	Internal discussions on CLCredit DIP, analysis of adequate protection, TS redline
9/16/2024	6.50	\$750	\$4,875	Adequate protection analysis and modeling, phone calls, mechanic lien negotiations
9/17/2024	4.50	\$750	\$3,375	Insurance negotiation, adequate protection analysis, lender liability analysis
9/18/2024	6.50	\$750	\$4,875	Lender liability analysis and preparation, phone calls, relief of stay analysis
9/19/2024	6.75	\$750	\$5,063	Lender liability phone calls, excel analysis w/ Gillett, cost to complete analysis
9/20/2024	6.25	\$750	\$4,688	Negotiations with CLCredit, excel analysis w/ Gillett, 3 Lockbox Cash Management analysis
9/21/2024	2.00	\$750	\$1,500	Internal discussions on strategy for upcoming week, excel analysis of DIP S&U
9/23/2024	5.25	\$750	\$3,938	Lender liability analysis, ACRES reserve history analysis, excel analysis w/ Gillett
9/24/2024	6.00	\$750	\$4,500	Member loan analysis, soft & hard cost completion analysis, HILCO underwriting analysis
9/25/2024	5.50	\$750	\$4,125	DIP negotiation, internal modeling on revised terms, HILCO analysis, lender liability analysis
9/26/2024	6.50	\$750	\$4,875	Information requests on DIP, lender liability analysis, HILCO diligence request, ACRES Reserve analysis
9/27/2024	5.25	\$750	\$3,938	Settlement Plan w/ Gillett preparation, analysis for Gillett, phone calls, HILCO requests

9/28/2024	1.50	\$750	\$1,125	Internal calls on strategy, excel analysis
9/29/2024	6.50	\$750	\$4,875	Reserves analysis, hard & soft cost analysis, Gillett settlement negotiations, phone calls
9/30/2024	5.50	\$750	\$4,125	Gillett settlement analysis, memo preparation and internal analysis, ACRES interest calculation analysis
10/1/2024	3.75	\$750	\$2,813	Analysis for cost to complete / mechanic liens, settlement preparation & analysis, DIP negotiations with CLCredit
10/2/2024	5.00	\$750	\$3,750	Settlement preparation & analysis, DIP negotiations with CLCredit, phone calls
10/3/2024	5.75	\$750	\$4,313	Member loan analysis, DIP negotiations, phone calls, excel analysis for mechanic liens
10/4/2024	5.00	\$750	\$3,750	ACRES negotiation analysis, phone calls, excel analysis for revised DIP terms
10/5/2024	1.75	\$750	\$1,313	Internal calls on strategy, memo preparation
10/7/2024	6.50	\$750	\$4,875	Gillett settlement negotiations, HILCO underwriting analysis, memo preparation
10/8/2024	4.50	\$750	\$3,375	Memo preparation / analysis, lender liability analysis, internal excel modeling, phone calls
10/9/2024	6.00	\$750	\$4,500	Disclosure statement, internal excel analysis, CLCredit DIP TS negotiations
10/10/2024	5.50	\$750	\$4,125	ACRES objection analysis, memo preparation, internal excel analysis, CLCredit DIP TS negotiation calls
10/11/2024	6.50	\$750	\$4,875	ACRES settlement statement analysis, HILCO diligence request, Lender liability analysis, CLCredit DIP TS calls
10/14/2024	4.25	\$750	\$3,188	ACRES objection analysis, HILCO diligence analysis, internal calls on strategy, internal excel analysis
10/15/2024	6.50	\$750	\$4,875	ACRES objection analysis, lender liability analysis, CLCredit DIP negotiation, Insurance negotiation, PCR report
10/16/2024	6.75	\$750	\$5,063	Gillett settlement analysis, internal excel analysis, phone calls, PCR negotiation, insurance phone calls
10/17/2024	4.25	\$750	\$3,188	CLCredit analysis, internal modeling and discussions for DIP, PCR negotiation, calls with Gillett and consultants
10/18/2024	5.50	\$750	\$4,125	Member loan analysis, DIP negotiations, lender liability calls, internal excel analysis, ACRES Settlement analysis
10/19/2024	6.50	\$750	\$4,875	Gillett pay app analysis, hard & soft cost reconciliation, internal excel analysis and memo preparation, phone calls
10/21/2024	6.75	\$750	\$5,063	Gillett settlement analysis, internal excel analysis, phone calls, hard cost reconciliation, ACRES negotiation phone calls
10/22/2024	6.00	\$750	\$4,500	Gillett settlement analysis, internal excel analysis, phone calls, hard cost reconciliation, ACRES strategy phone calls
10/23/2024	5.25	\$750	\$3,938	CLCredit analysis, PCR report, internal excel analysis, phone calls, internal strategy preparation
10/24/2024	6.50	\$750	\$4,875	Insurance negotiation, internal excel modeling, Gillett settlement negotiations, ACRES negotiation calls
10/25/2024	5.50	\$750	\$4,125	Gillett memo preparation and analysis, PCCO negotiation, Insurance calls, reconciliation and analysis for DIP lender
10/26/2024	5.50	\$750	\$4,125	PCCO negotiation, internal excel analysis and memo preparation, reconciliation reports for DIP lender, Insurance negotiations
10/28/2024	6.50	\$750	\$4,875	9019 motion analysis, ACRES DIP analysis, Insurance negotiations, PCCO negotiation, internal strategy calls
10/29/2024	5.00	\$750	\$3,750	9019 motion analysis, PCCO negotiation, internal excel analysis and memo preparation, CLCredit TS negotiations
10/30/2024	5.50	\$750	\$4,125	RPM Property Management discussions, residential proforma modeling, CLCredit TS negotiations, insurance carrier negotiations
10/31/2024	6.75	\$750	\$5,063	Appraisal analysis, RPM Management underwriting analysis, internal leaseup projections and debt service modeling
11/1/2024	4.50	\$750	\$3,375	Appraisal analysis, Henderson personnel meetings, internal excel analysis and memo preparation, phone calls
11/4/2024	6.50	\$750	\$4,875	Member loan analysis, appraisal analysis, adequate protection analysis, insurance negotiation, construction cost reconciliation
11/5/2024	5.25	\$750	\$3,938	CLCredit termsheet analysis, business plan analysis and memo preparation, insurance negotiation, Colliers commercial leasing calls
11/6/2024	5.50	\$750	\$4,125	Residential underwriting analysis, CLCredit diligence modeling, RPM Management diligence underwriting, disclosure plan analysis
11/7/2024	4.50	\$750	\$3,375	Development accounting analysis, internal excel modeling, phone calls, appraisal analysis, disclosure plan analysis
11/8/2024	5.25	\$750	\$3,938	ACRES termsheet analysis, disclosure plan analysis, development accounting analysis, phone calls with insurance carriers
11/9/2024	6.50	\$750	\$4,875	Disclosure plan analysis and preparation, internal excel modeling, internal phone calls to discuss strategy
11/10/2024	5.50	\$750	\$4,125	ACRES DIP analysis, lender liability analysis, internal phone calls for strategy, internal excel modeling and memo preparation
11/11/2024	6.25	\$750	\$4,688	ACRES DIP analysis, settlement statement preparation and analysis, excel modeling for internal strategy discussions
11/12/2024	3.50	\$750	\$2,625	Appraisal and BOV analysis, Colliers commercial leasing analysis, RPM residential underwriting analysis, insurance calls
11/13/2024	5.50	\$750	\$4,125	ACRES DIP analysis, settlement statement analysis, internal excel modeling, phone calls
11/14/2024	5.00	\$750	\$3,750	Worth Group discussion, Gillett phone calls, internal excel modeling, phone calls with legal
11/15/2024	5.75	\$750	\$4,313	ACRES Settlement negotiations and analysis, phone calls with legal, insurance analysis

11/18/2024	3.75	\$750	\$2,813	Reconciliation analysis, internal excel modeling, RPM residential underwriting analysis, Colliers leasing analysis and calls
11/19/2024	5.50	\$750	\$4,125	Insurance analysis, reconciliation of S&U, ACRES DIP analysis, internal calls for strategy
11/20/2024	5.00	\$750	\$3,750	ACRES negotiation analysis, calls with Gillett and Debtor regarding strategy, settlement analysis, internal excel modeling
11/21/2024	6.75	\$750	\$5,063	Member loan reconciliation and analysis, calls with Gillett, S&U analysis and interest calculations
11/22/2024	3.50	\$750	\$2,625	RPM discussions, internal calls with Gillett, insurance analysis
11/25/2024	2.50	\$750	\$1,875	Discussions with DTH 215 Venture / Development, Gillett & Worth Group Rev10 underwriting, Insurance Carrier calls
11/26/2024	3.00	\$750	\$2,250	Analysis of Debtor bank statements and accounting records
12/3/2024	3.50	\$750	\$2,625	Insurance binding calls / analysis, PCCO calls with Gillett Construction and Greenberg Taurig, DIP budget preparation and analysis, Rev10 email correspondance with Worth Group
12/4/2024	5.00	\$750	\$3,750	PCR form, DIP monthly budget preparation, PCCO calls with Gillett Construction and Greenberg Taurig, Rev10 correspondance, Gillett Schedule of Values analysis
12/9/2024	1.50	\$750	\$1,125	PCCO discussions with Gillett & Greenberg, Insurance Calls w/ IOA on Extension, PCR Form calls and discussions
12/13/2024	1.50	\$750	\$1,125	DIP Motion calls, analysis for updating model, Gillett conversations on subcontractor review
12/17/2024	3.00	\$750	\$2,250	Weekly Disbursements analysis for updating model, Gillett conversations on agenda and PCCO, NV Energy calls and analysis, IOA Insurance calls
12/18/2024	2.50	\$750	\$1,875	Weekly Disbursements analysis for updating model, Gillett conversations on PCCO, NV Energy calls, IOA Insurance calls
12/19/2024	1.75	\$750	\$1,313	Weekly Disbursements analysis for updating model, NV Energy Calls
12/20/2024	2.75	\$750	\$2,063	SW Gas calls / invoicing, Worth Group Rev10 calls and emails, IOA insurance calls & analysis, weekly disbursements analysis for updating model
12/27/2024	1.50	\$750	\$1,125	Insurance calls with IOA updating policy / invoices, calls with Greenberg Taurig on revising the PCCO, calls with Gillett over PCCO revisions
12/30/2024	1.75	\$750	\$1,313	Insurance calls, Calls with Gillett about PCCO, DIP Motion analysis
1/6/2025	3.50	\$750	\$2,625	Analysis/Calls with Gillett on PCCO and Settlement Agreement, budget review with ACRES, DIP Motion Order analysis / calls
1/8/2025	3.25	\$750	\$2,438	Analysis/Calls with Gillett on PCCO and Settlement Agreement, budget review with ACRES, DIP Motion Order analysis / calls
1/9/2025	3.75	\$750	\$2,813	Calls with Colliers on commercial leasing tour, Calls with RPM on Transition / Startup, Calls with Gillett on PCCO, analysis of parking modeling
1/13/2025	4.50	\$750	\$3,375	Calls with Cox Communication, PCR calls with Partner, Calls with Gillett on PCCO and Mechanic Liens, RPM Transition / Marketing calls, IOA Insurance calls
1/15/2025	3.25	\$750	\$2,438	Calls with Gillett on PCCO and Mechanic Liens, RPM Marketing call, ROI Commercial Leasing Call, Title+ACRES+Gillett Lien call
1/20/2025	1.25	\$750	\$938	Calls with ROI on commercial leasing, calls with RPM on Marketing and Onboarding, Insurance calls with IOA
1/20/2025	1.25	\$750	\$938	Calls with ROI on commercial leasing, calls with RPM on Marketing and Onboarding, Insurance calls with IOA
1/21/2025	2.5	\$750	\$1,875	Calls with Debtor on closing checklist items, RPM Site Visit debrief call, Debtor & Gillett call on Closing Checklist, Calls with IOA on Insurance
1/22/2025	1	\$750	\$750	Calls with IOA and ACRES on insurance, calls with ROI on Commercial leasing, Closing Checklist items
1/23/2025	3.75	\$750	\$2,813	Calls with Gillett on Closing Checklist, DIP Closing checklist call, COX communication setup, RPM onboarding setup documents, Legal call on DIP Motion
1/28/2025	1.75	\$750	\$1,313	Calls with Gillett on Closing Checklist, DIP Closing checklist call, RPM onboarding setup documents, Insurance calls with IOA
1/29/2025	1.75	\$750	\$1,313	Closing Checklist items, Calls with Worth Group on consent form
1/30/2025	2.5	\$750	\$1,875	Closing Checklist items, Calls with IOA on Insurance, Calls with Gillett Construction on consent form
1/31/2025	1.25	\$750	\$938	Closing Checklist items, Calls with IOA on Insurance, Calls with Gillett Construction on consent form
2/1/2025	1.25	\$750	\$938	Modeling out revised ACRES DIP excel with updated costs and dates
2/3/2025	0.75	\$750	\$563	Calls with IOA on insurance, Flagstar checklist items, Developer Consent calls, modifying the DIP Excel
2/4/2025	5.25	\$750	\$3,938	Closing call checklist items, calls with DTH on KYC for Flagstar, lien release calls and organization
2/5/2025	3.25	\$750	\$2,438	Gillett Consent form call; closing checklist items, calls with IOA on insurance, modifying the DIP excel
2/6/2025	2.25	\$750	\$1,688	Watermark weekly coordination call w/ city, call w/ IOA and Gillett on insurance, closing call checklist items, calls with DTH on closing statement items
2/7/2025	1.25	\$750	\$938	Calls and emails on remaining checklist items, calls with contractors on lien consent forms and releases, calls with Darren and Parker Nelson on closing checklist items and Consent Agreement
2/11/2025	2	\$750	\$1,500	Calls with RPM and ROI on next steps, internall calls with DTH for closing checklist items, modifying for DIP excel per final settlement statement
2/12/2025	0.75	\$750	\$563	Calls with Insurance about premium audit/invoicing
2/13/2025	1	\$750	\$750	Revising settlement statement / DIP accounting, calls with ACRES and DTH on revising the model / adequate protection calculations